

UNITED STATES DEPARTMENT OF JUSTICE
OFFICE OF THE UNITED STATES TRUSTEE
ANDREW R. VARA

UNITED STATES TRUSTEE, REGION 3 & 9

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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re	:	Case No. 18-33676 (JKS)
	:	Chapter 7
	:	
Volvic A. Chaperon,	:	The Honorable John K. Sherwood
	:	
Debtor.	:	
	:	

**APPLICATION FOR THE ENTRY OF A CONSENT ORDER EXTENDING TIME TO
FILE A MOTION TO DISMISS CASE UNDER 11 U.S.C. § 707(b)(1) AND (3) AND
EXTENDING TIME TO FILE A COMPLAINT OBJECTING TO DISCHARGE UNDER
11 U.S.C. § 727**

The United States Trustee (“U.S. Trustee”), by and through counsel, in furtherance of his duties and responsibilities under 28 U.S.C. §§ 586(a)(3) and (5), hereby respectfully submits this Application for the entry of the *Consent Order Extending Time to File a Motion to Dismiss Case Under 11 U.S.C. §§ 707(b)(1) and (3) and Extending Time to File a Complaint Objecting to Discharge Under 11 U.S.C. § 727*.

1. In support of this Application, the U.S. Trustee respectfully represents as follows: The docket for this case reflects that on November 30, 2018, Volvic A. Chaperon (“Debtor”) filed a

voluntary petition for relief under chapter 7 of title 11 of the United States Code (“Bankruptcy Code”).

2. The docket also reflects that a meeting of creditors pursuant to 11 U.S.C. § 341(a) was held on January 7, 2019.

3. The U.S. Trustee is conducting an independent review of the Debtor’s case warranting further investigation.

4. The Debtor is cooperating and the investigation is ongoing. A meeting between the Debtor and the U.S. Trustee occurred last month. The Debtor has submitted some of the supplemental documents requested at the meeting. Debtor requires additional time to gather the remaining supplemental documents and the U.S. Trustee requires additional time to review those documents.

5. Unless the consent order is entered, the Debtor will automatically be issued a discharge upon expiration of the current February 27, 2020, deadline, before the U.S. Trustee completes its investigation. As a result, the U.S. Trustee respectfully requests that the Court enter the Consent Order and extend the deadline for filing a motion to dismiss under 11 U.S.C. §§ 707(b)(1) and (3) or a complaint objecting to discharge under 11 U.S.C. § 727, to March 31, 2020, as agreed to by the Debtor.

6. The U.S. Trustee reserves his rights to seek any additional extensions of time for good cause shown.

Respectfully submitted,
ANDREW R. VARA
UNITED STATES TRUSTEE
REGION 3 & 9

By: /s/ Jeffrey M. Sponder

Jeffrey M. Sponder

Trial Attorney

DATED: February 27, 2020